

EXHIBIT A



☐ REPLY TO
900 CENTERTON ROAD
MOUNT LAUREL, NJ 08054

(856) 914-0220
(856) 914-0429 (FAX)

PUBLIC LEDGER BUILDING, SUITE 1000
150 SOUTH INDEPENDENCE MALL WEST
PHILADELPHIA, PENNSYLVANIA 19106-3413
(215) 446-4460 - (866) 222-FELA (US) - (215) 446-4479 (FAX)
hjmail@hannonandjoyce.com

July 14, 2005

James J. Walsh
Herlihy, Thursby and Herlihy, LLP
133 Federal Street
Boston, MA 02110

RE: Henry Satrowsky vs. Springfield Terminal Railway Company
Civil Action No. 04-10827-JLT

Mr. Walsh:

Enclosed herewith please find Plaintiff's Answers to Defendant's
Interrogatories and Request for Production of Documents.

If you have any questions or need additional information, please do not
hesitate to contact me. Thank you for your time and consideration.

Very truly yours,

THOMAS J. JOYCE, III

TJJ:djr

Enc.

Cc: Michael J. McDevitt, Esq. (w/o encs)

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
Boston Division

HENRY SATROWSKY,

Plaintiff,

vs.

CIVIL ACTION NO. 04-10827-JLT

SPRINGFIELD TERMINAL RAILWAY
COMPANY,

Defendants.

PLAINTIFF'S ANSWERS TO DEFENDANT'S
FIRST SET OF INTERROGATORIES

Plaintiff, by and through his attorneys, Hannon & Joyce, hereby answers the Defendant's First Interrogatories, pursuant to the Federal Rules of Civil Procedure, avers as follows:

1. Henry J. Satrowsky. 10 Holtshire Road, Orange, MA 01364.
12/02/44. 026-34-5572.
2. There was no specific date. Plaintiff sustained occupational cumulative trauma as a result of his employment with the railroad.
3. Plaintiff suffers from bilateral foot and ankle injuries. The Plaintiff has sustained pain, suffering, inconvenience, stress, and a loss of enjoyment of life.
4. None.
5. Plaintiff believes that, in general, the tools used were adequate.
6. Defendants were negligent in its failure to provide Plaintiff a safe place to work as required by the Federal Employer's Liability Act, 45 U.S. §§ 51-60; failure to provide a timely and adequate

ergonomic program designed to prevent occupational cumulative trauma; failure to comply with safety and operating rules and regulations of the Defendant; forcing the Plaintiff to work under hurried and/or awkward conditions; failing to adequately maintain and/or install proper ballast; and otherwise failing to exercise due and adequate care under the circumstances including, but not limited to a lack of adequate manpower.

7. This information is not within Plaintiff's knowledge.
 8. Yes. Plaintiff received only on the job training. Plaintiff received no ergonomic training.
 9. Defendant failed to provide Plaintiff with training designed to inform Plaintiff of occupational cumulative training and to prevent occupational cumulative trauma.
 10. Yes. If Plaintiff had received adequate ergonomic and safety training, his injuries could have been avoided.
-
11. See answer to Interrogatory 9.
 12. Plaintiff sustained occupational cumulative trauma to his ankles and feet, which resulted in him becoming disabled.
 13. Plaintiff has been and may continue to be required to receive and undergo medical treatment and medical care, including surgery, and has incurred reasonable and necessary medical expenses.
Please see attached medical records.
 14. Plaintiff has been unable to work since 2002, but has not been confined to a bed or home.
 15. See answer to Interrogatory 3.
 16. Plaintiff had surgery for bone spurs on his foot on 2/29/00, and also had surgery on 8/3/98 for a hernia. This information is within the Possession of Defendant.
 17. Plaintiff has not yet retained any expert witness. Plaintiff intends to use Dr. Shinnick.
 18. Plaintiff became disabled in May of 2002.

Plaintiff reserves the right to amend or supplement Plaintiff's Answers to Defendant's Interrogatories prior to trial.

HANNON & JOYCE

Dated: June 30, 2005

By:

THOMAS J. JOYCE, III, ESQUIRE
Public Ledger Building, Suite 1000
150 S. Independence Mall West
Philadelphia, PA 19106

MICHAEL J. McDEVITT, ESQUIRE
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210
617-439-4990

Attorneys for Plaintiff

VERIFICATION

I, HENRY SATROWSKY, have read the foregoing. The statements

herein are correct to the best of my personal knowledge, information, and/or belief.

Henry Satrowsky
(Signature)

Date: June 30 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
Boston Division

HENRY SATROWSKY,

Plaintiff,

vs.

CIVIL ACTION NO. 04-10827-JLT

SPRINGFIELD TERMINAL RAILWAY
COMPANY,

Defendants.

PLAINTIFF'S RESPONSE TO DEFENDANTS' FIRST REQUEST TO PRODUCE

Plaintiff, by and through his attorneys, Hannon & Joyce, sets forth his response to the Defendants' First Request to Produce, avers as follows:

1. See attached medical records.
2. See attached medical records.
3. To be provided.
4. To be provided, if applicable.
5. None.
6. None.
7. Within Defendant's possession.

Plaintiff reserves the right to amend or supplement Plaintiff's response to Defendants' Request to Produce prior to trial.

HANNON & JOYCE

Dated: June 30, 2005

By: 

THOMAS J. JOYCE, III, ESQUIRE
Public Ledger Building, Suite 1000
150 S. Independence Mall West
Philadelphia, PA 19106

MICHAEL J. McDEVITT, ESQUIRE
Lawson & Weitzen, LLP
88 Black Falcon Avenue, Suite 345
Boston, MA 02210
617-439-4990
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, THOMAS J. JOYCE, III, hereby certify that I forwarded a true and correct copy of Plaintiff's Answers to Defendant's Interrogatories and Request to Produce to James J. Walsh, Esquire, Herlihy, Thursby and Herlihy, LLP, 133 Federal Street, Boston, MA 02110, attorney for Defendant, by depositing same in United States Mail, first class, postage prepaid, this 4th day of July, 2005.


THOMAS J. JOYCE, III